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VIA ECF

The Honorable Vincent L. Briccetti
United States District Court for the Southern District of New York
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Jimenez v. Artsana USA, Inc.*, Case No. 21-cv-07933-VB

Dear Judge Briccetti:

I represent Plaintiffs in the above-referenced matter. Pursuant to Rule 1.A of Your Honor's Individual Practices, I respectfully request to file under seal Exhibits D and E of the Declaration of Antonio Vozzolo, submitted in support of Plaintiffs' Reply in Support of their Motion for Attorneys' Fees, Costs, Expenses and Incentive Awards. The reason for the request is because Exhibits D and E to the Vozzolo Declaration are emails discussing Angeion's proprietary anti-fraud efforts and, if disclosed, may undermine Angeion's ability to combat fraudulent claims. Accordingly, Angeion seeks to avoid public disclosure of the aforementioned sensitive business information. The Court has previously granted requests to seal similar materials in this matter (ECF Nos. 74, 88), and Plaintiffs respectfully submit it is appropriate here as well.

Respectfully Submitted,

/s/ Alec M. Leslie

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